

1 Tanvir H. Rahman (admitted *pro hac vice*)

FILIPPATOS PLLC

2 199 Main Street,

Suite 800 White

3 Plains, NY 10601

Tel.: 914 984 1111

4 trahman@filippatoslaw.com

5 Sam Brown (State Bar. No. 308558)

KRAMER BROWN HUI LLP (FORMERLY HENNIG KRAMER LLP)

6 3600 Wilshire Blvd, Suite 1908

Los Angeles, CA 90010

7 Tel.: +1 213 310 8301

8 sam@kbhllp.com

9 *Attorneys for Plaintiff (withdrawal pending)*

10 UNITED STATES DISTRICT

11 COURT NORTHERN DISTRICT OF CALIFORNIA

12 OAKLAND DIVISION

13 ZOYA KOVALENKO,

14 Plaintiff,

15 vs.

16 KIRKLAND & ELLIS LLP, MICHAEL DE
VRIES, MICHAEL W. DEVRIES, P.C., ADAM
17 ALPER, ADAM R. ALPER, P.C., AKSHAY
DEORAS, AKSHAY S. DEORAS, P.C., AND
18 MARK FAHEY,

19 Defendants.

) Case No.: 4:22-cv-05990-(HSG)

)
) **FILIPPATOS PLLC's NOTICE OF**
) **MOTION AND ADMINISTRATIVE**
) **MOTION TO CONVERT THE MARCH 20,**
) **2025, HEARING TO A TELEPHONIC OR**
) **VIDEO CONFERENCE**

) Assigned to the Honorable Haywood S. Gilliam,
Jr., Oakland Division, United States District
) Court for the Northern District of California

) Accompanying Documents:

) Proposed Order

) Declaration of Tanvir H. Rahman

21
22 **NOTICE OF MOTION AND ADMINISTRATIVE MOTION FOR TELEPHONIC OR**
23 **VIDEO CONFERENCE**

24 TO ALL PARTIES AND THEIR COUNSEL OF RECORD: PLEASE TAKE NOTICE
25 THAT Non-Party Filippatos PLLC respectfully requests that all parties be permitted to participate in
26 the hearing on Plaintiff Zoya Kovalenko's pending Motion to Notice Termination of Filippatos PLLC

1 For Cause (Dkt. No. 171) and Filippatos PLLC's and local counsel Hennig Kramer LLP's pending
2 Cross Motion To Withdraw as Counsel and To Compel Arbitration (Dkt. No. 177), presently noticed
3 for Thursday, March 20, 2025, at 2:00pm before the Honorable Haywood S. Gilliam, Jr., remotely
4 via video conference or the phone.

5 There is good cause to hold this conference remotely. First, Filippatos PLLC is based in New
6 York. Rahman Decl. at ¶ 2. It would be a hardship for the undersigned to have to travel to Oakland,
7 California merely to attend this hearing in person given the length of time and expense it would take
8 to travel cross country to and from California, as well as the disruption it will cause to certain family
9 and childcare obligations of the undersigned. Rahman Decl. at ¶ 3. Moreover, the undersigned is a
10 practicing Muslim, and it will be a hardship to travel to and from Oakland, California in the present
11 month of Ramadan, in which the undersigned will be fasting during daytime hours. Rahman Decl. at
12 ¶ 4. Further, all other hearings that have taken place since Filippatos PLLC has appeared in this case
13 have been conducted remotely without issue, including the hearing with respect to Plaintiff's Motion
14 to Quash Defendants' Subpoenas and For Protective Order (Dkt. No. 113), which was held remotely
15 on February 15, 2024 (*see* Dkt. Nos. 125; 146); a discovery hearing which took place remotely on
16 October 2, 2024 (*see* Dkt. No. 143); and a Case management Conference held remotely on October
17 8, 2024. *See* Dkt. No. 153. Rahman Decl. at ¶ 5.

18 We have conferred with counsel for Defendants who have no objection to this request.
19 Rahman Decl. at ¶ 6. We have also conferred with Plaintiff Zoya Kovalenko who has indicated that
20 she does not consent to this request because she does not believe there is good cause to request a
21 remote hearing. Rahman Decl. at ¶ 7. We respectfully submit that there is good cause to hold this
22 hearing remotely given that Filippatos PLLC is based in New York and it would be a hardship to
23 travel cross country merely to attend this hearing (which is based on a motion filed by Plaintiff which
24 Filippatos PLLC maintains, respectfully, was improperly filed with and should not be heard by this
25 Court), all other hearings that have taken place since Filippatos PLLC has appeared in this case have
26 been conducted remotely, and, while she does not join in this request, we understand that Plaintiff

1 Kovalenko presently resides in Maryland and has stated in a declaration submitted to this Court that
 2 paying her outstanding legal costs incurred on her behalf by Filippatos PLLC would “impose a
 3 financial hardship on [her] given that [she has] been unemployed since being terminated in 2021”
 4 (*see* Dkt. No. 181-1, at ¶ 7), which would suggest that traveling cross country to attend this hearing
 5 in person would also pose a “financial hardship.” Rahman Decl. at ¶ 8-9.

6 Accordingly, we respectfully request that the Court convert the March 20, 2025, in-person
 7 hearing into a remote hearing. A proposed order is simultaneously being filed for the Court’s
 8 convenience.

9 Date: March 3, 2025
 10 White Plains, New York

11 Respectfully submitted,

12 By: /s/ Tanvir H. Rahman
 13 Tanvir H. Rahman (admitted pro hac vice)
 14 FILIPPATOS PLLC
 15 199 Main Street, Suite 800
 16 White Plains, NY 10601
 17 Tel.: 914 984 1111
 18 trahman@filippatoslaw.com

19 Sam Brown (State Bar. No. 308558)
 20 KRAMER BROWN & HUI LLP
 21 3600 Wilshire Blvd, Suite 1908
 22 Los Angeles, CA 90010
 23 Tel.: +1 213 310 8301
 24 sam@kbhllp.com

25 *Attorneys for Plaintiff (pending withdrawal)*
 26
 27
 28